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July 21, 2022

VIA ECF

The Honorable Paul G. Gardephe
United States for the District Court
for the Southern District of New York
40 Foley Square, Room 618
New York, New York 10007

**Re: Azima v. Handjani, Case No: 21 Misc. 501 (PGG):
Petitioner's Supplemental Letter in Support of Application for
Order to Take Discovery Pursuant to 28 U.S.C. § 1782**

Dear Judge Gardephe:

We write on behalf of Farhad Azima, the Petitioner, and respectfully file this Supplemental Letter in Support of his Application for an Order to Take Discovery Pursuant to 28 U.S.C. § 1782. On July 15, 2022, this Court granted Mr. Azima's application for discovery of Respondent Amir Handjani and ordered Mr. Azima to file a proposed subpoena for the Court's approval by July 21, 2022. Pursuant to the Court's order, Mr. Azima submits his response below and attached in the form of a Proposed Document Subpoena and Proposed Notice of Deposition. The Proposed Document Subpoena contains two substantive requests:

1. All documents and communications from September 2014 to present related to Farhad Azima or Azima's Associates, including but not limited to: (1) documents related to all Project Updates and similar reports prepared about Mr. Azima and Azima's Associates; (2) documents related to the instructions to "target" and "go after" Mr. Azima; (3) documents related to the "View from the Window" document provided by Karv Communications to Mr. Gerrard; (4) documents related to the purported discovery of Mr. Azima's stolen data in August 2016; (5) documents related to the websites published about Mr. Azima and links published on those websites between August 2016 and June 2019; and (6) documents related to communications between Mr. Handjani and Mr. Azima.

2. All documents and communications from September 2014 to present related to the following persons and entities that are alleged to be involved in the attack on Mr. Azima: CyberRoot, BellTroX, RAK Ruler Sheikh Saud bin Saqr Al Qasimi, James Buchanan, Stuart Page and any companies controlled by Mr. Page including Stuart Page MEFZ, Vital Management Services, Inc., Nicholas Del Rosso, Northern Technology Inc., and Gravitas International LLC. See ECF No. 26 at 17.

Mr. Azima submits the attached Proposed Document Subpoena containing the aforementioned requests and a Proposed Notice of Deposition pursuant to the Court's order dated July 15, 2022, granting Mr. Azima's Application for Order to Take a Discovery Pursuant to 28 U.S.C. § 1782.

Sincerely,



Calvin Lee